











FirstGroup corporate responsibility reporting guidelines June 2018

2018 Corporate Responsibility Report

The FirstGroup plc 2018 Corporate Responsibility Report ("the Report") is published annually and is available as a standalone summary at www.firstgroupplc.com/responsibility. We also highlight our corporate responsibility priorities and performance within our Annual Report and Accounts.

The Report covers our progress and plans for our most material corporate responsibility (social, economic and environmental) issues. We use several techniques to understand and assess our key sustainability risks and opportunities, including horizon s canning, stakeholder engagement and expert insight. We prioritise and document issues for reporting purposes using our in-house materiality analysis.

Performance data

The following tables summarise reporting boundaries, scope and exclusions relating to the performance data shown in the Report.

All data in the Report relates to the financial year from 1 April 2017 to 31 March 2018, unless otherwise stated, and to the Group and its operating divisions across the UK and North America. Where necessary, we have recalculated our baseline emissions in accordance with our re-baselining policy to reflect the addition of the South West Rail Franchise to our business on 20th August 2017.















Providing solutions for a congested world

Per	formance indicator (PI)	Definition	Boundaries, scope and exclusions
1	FirstGroup carbon footprint in tonnes of CO ₂ (e)	The annual organisational carbon footprint of FirstGroup plc (in tonnes of carbon dioxide equivalent).	FirstGroup have chosen the operational control approach to establish the company organisational boundary for accounting and reporting its greenhouse gas (GHG) emissions. This is in line with the WRI/WBSCD Greenhouse Gas Protocol. FirstGroup has established a materiality threshold of 5%. Any operations emitting less than 5% of the company's total GHG emissions (or in combination with other emission are less than 5% corporate emissions) will be regarded as immaterial. We have reported all material emission sources using the following emission factors: DEFRA/DECC UK Government conversion factors for GHG Company Reporting 2017 Climate Leadership. US Environmental Protection Agency (March 2018) US Environmental Protection Agency eGRID (Sub Region & US Average) - 2016 (Released Feb 2018) Note: eGRID 2016 Summary Tables https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid Canada National Inventory Report 2017 (1990-2015) European Residual Mixes 2015 for the United Kingdom - Association of Issuing Bodies Scope: Scope 1 Direct emissions from vehicle use (owned and leased), fugitive refrigerant gas emissions, heating fuels used in buildings and fugitive refrigerant emissions from air conditioning systems within our North American vehicle fleets and from UK buildings.













Scope 2 – Indirect emissions from electricity used in our buildings, and to power our electric rail and bus fleet.

- We have reported both location-based emission factors (considering UK grid average) and market-based emissions factors (which relate to our procurement of electricity supplies from renewable or other low carbon sources). Where this is the case, we have used an emission factor of zero for renewable electricity covered by Renewable Energy Guarantee of Origin (REGO) certificates.
- For the proportion of UK electricity that has been generated from non-renewable sources, we
 have used a residual-mix factor which represents the shares of electricity generation attributes
 available for disclosure, after the use of tracking systems, such as REGOs, has been accounted
 for.
- We have applied the location-based emissions factors (e-GRID) to calculate the market based scope 2 emissions, for electricity used by FirstGroup in North America. For all historical scope 2 market based emissions, we have applied location-based emission factors. Scope 2 emissions in North America were calculated using CO₂ and not CO₂(e) due to limited conversion factors being available.

Scope 3 – Indirect emissions related to wastes we produce, services provided by First Travel Solutions and business travel by air.

Out of scope - Indirect emissions associated with the 'bio' component of standard road fuels

The Company's baseline year is 2015/16. The same baseline year has been selected as the target 'base year' for FirstGroup's longer-term carbon reduction objectives, which describe our sectoral contribution to shared international aims to prevent global temperature rise to no more than 2 degrees' Celsius compared to pre-industrial levels.

Exclusions:

North America Rail Operations (currently a single service at Denton, TX), First Transit services in Panama and India, Tram Operations Limited fleet energy consumption, refrigerant gases from fleet and buildings not listed elsewhere.













2	FirstGroup carbon footprint in tonnes of CO₂(e) by division	The 2017/18 organisational carbon footprint of FirstGroup plc (in tonnes of carbon dioxide equivalent), broken down by division.	See comments for PI 1 above. Data as reported here includes out of scope emissions from the bio-fuel component of road fuels, employee business travel (air), and emissions from third party owned buildings which fall under our Group Procurement central utilities agreement – i.e. where we pay the energy bill direct to the central supplier(s). Exclusions: North America Rail Operations (currently a single service at Denton, TX), First Transit services in Panama and India, Tram Operations Limited fleet, refrigerant gases from fleet and buildings not listed elsewhere. energy consumption.
3	FirstGroup carbon footprint in tonnes of CO ₂ (e) by source	The 2017/18 organisational carbon footprint of FirstGroup plc (in tonnes of carbon dioxide equivalent), broken down by source.	Sources: Liquid fuel powered road vehicles (including out of scope biofuels in First Bus - see note in PI 1 above) Natural gas use in buildings Electricity use in buildings Heating oils Fugitive refrigerant gases Electricity used to power trains and buses Employee business (air) travel Emissions associated with First Travel Solutions services (including Scope 3 emissions associated with our organisation of transport services for third parties by third party fleets) Carbon emissions related to our management of wastes Exclusions: North America Rail Operations (currently a single service at Denton, TX), First Transit services in Panama and India, Tram Operations Limited fleet energy consumption. Electricity used in battery powered electric fleets in North America and refrigerant gases from fleet and buildings not listed elsewhere.













4	Tonnes of CO ₂ (e) per £1m of revenue	The 2017/18 organisational carbon footprint of FirstGroup Plc (in tonnes of carbon dioxide equivalent), normalised by revenue	See comments for PI 1 above. FirstGroup revenue as reported in the Group's Annual Report and Accounts (£m): 2017/18: 6,398.4 (this figure includes SWR revenue from 20.8.17-31.3.18, however has been extended on a pro-rata basis as a 'whole year' revenue total of £6,770.7 according to our re-baselining policy and Appendix E of Appendix E to the GHG Protocol Corporate Accounting and re-baselining guidance issued in "Reporting Standard Revised Edition (Base year recalculation methodologies for structural changes)" Jan 2005 (World Resources Institute) • 2016/17: 5,653.3 • 2015/16: 5,218.1
5	Average grams of CO ₂ (e) per passenger kilometre	Annual greenhouse gas emissions (in grams of carbon dioxide equivalent) from fuel use by our vehicles within First Bus, First Rail and Greyhound, normalised by passenger kilometre.	Scope: First Bus First Rail Greyhound. First Bus passenger km data is derived from the National Travel Survey Statistics (NTS) average trip length (Department for Transport, 2015, How people travel (mode) (NTS03), UK Revised 27 Jul 2017) together with information relating to First Bus ticket sales. First Rail passenger km data are sourced from the Office of Rail and Road (ORR) statistical methodology which calculates passenger kilometres by ticket type. Passenger kilometres are derived by taking the distance in kilometres between two stations, and multiplying it by the quantity of passengers on that service. This is then broken down into passengers using season tickets and passengers using full-price tickets as these services have different costs. ORR collects this data in the Latest Earnings Network Nationally over Night (LENNON) ticketing and revenue database.













6	Average grams of CO ₂ (e) per vehicle kilometre	The annual amount of direct greenhouse gas emissions (in grams of carbon dioxide equivalent) from fuel usage by our vehicles, normalised by vehicle kilometre.	Scope: First Student First Transit Vehicle distance is calculated by either pre-measured, scheduled journey lengths or by measured (GPS or odometer derived data) vehicle distance.
7	Energy usage (kWh) in UK and North American properties	The annual energy consumption (in kilowatt-hours) from our properties in the UK and North America.	Scope and exclusions: Includes gas and electricity consumption in those buildings where we pay energy bills direct to a utility company, including Tram Operations Limited. Excludes: energy used at sites where energy bills are paid to a third party (for example Network Rail or a commercial landlord where energy may be part of an overall service charge); where a contracting government entity is responsible for real estate costs; or where consumption is unmetered.
8	Significant air emissions from First Bus fleet (tonnes)	The annual amount of significant air emissions generated by our First Bus fleet.	Scope: Carbon monoxide Total particulates Hydrocarbons Mono-oxides of Nitrogen (NOx) i.e. Nitric Oxide and Nitrogen Dioxide. Source of conversion factors: 10th Informative Inventory Report (IIR) from the UK National Atmospheric Emissions Inventory (NAEI) Programme (2013)













9	Significant air emissions from First Rail fleet (tonnes)	The annual amount of significant air emissions generated by our First Rail fleet.	 Scope: Carbon monoxide Particulates Hydrocarbons Mono-oxides of Nitrogen (NOx) i.e. Nitric Oxide and Nitrogen Dioxide. Source of conversion factors: Interfleet Technology Ltd, (2005): Technical Report. Conversion factors are applied to our First Rail fleet to calculate total air emissions. Exclusions: Indirect emissions relating to electricity used to power our trains.
10	Significant air emissions from North American fleets (tonnes)	The annual amount of significant air emissions generated by our North American vehicle fleets.	 Scope: Total Particulates Mono-oxides of Nitrogen (NOx) i.e. Nitric Oxide and Nitrogen Dioxide. Source of conversion factors: NOx and Total Particulate matter (PM) are calculated using US Environment Protection Agency (EPA)'s 'SmartWay' Truck Carrier Partner 2.0.17 (2017) tool NOx and PM estimates are based on fleet characteristics and miles only for vehicle classes 2 - 8. The conversion factors contained in the above are applied to our total mileage for each vehicle class. These are defined by the weight of each vehicle according to the above EPA reporting model.













11	Waste generation (tonnes)	The annual amount of waste generated within our First Bus, First Rail and North American divisions.	Scope: UK – all non-hazardous waste is reported. Non-hazardous waste is weighed within standard sized 'Euro' containers by our waste contractor on a sample basis to determine totals. Where 'actual' weights are not received, interpolated waste weights may be used by our waste contractor. Waste received by third parties (e.g. First Rail station tenants) and subsequently disposed by FirstGroup are also included within our reported waste totals. North America – Non-hazardous waste weights and their method of disposal is estimated on the basis of known waste container volume (cubic yards) at each site. Estimates made are specific to the type of waste produced in our sector (Transport) to ensure accuracy. Our recycling total includes a small proportion of wastes (oils) which some states/ provinces classify as 'Hazardous' or 'Special'. Exclusions: Sanitary waste is excluded from the overall waste total and is de-minimus. Waste disposed of from facilities that we do not directly operate is not included in our reported waste totals (e.g. Network Rail Stations where wastes are managed by our landlord). Scrap metal totals in North America are excluded from our recycling totals. Hazardous waste in UK (we do not have comprehensive information on hazardous wastes arising) North America Rail Operations (currently a single service at Denton, TX) , First Transit services in Panama and India, Tram Operations Limited.
12	Waste recycling rates (%)	The proportion of waste generated within our First Bus, First Rail and North American divisions that is recycled (on site).	See comments for PI 11 above. The definition we have adopted for 'recycled' is: Waste disposed of in recycling bins (which meets our contracted acceptance criteria for treatment at materials recycling facilities) Wastes which (after incineration) are used as an alternative to primary materials (e.g. as aggregate substitutes in road engineering)













13	Water usage (m³)	The annual amount	Scope and exclusions:	
	of water used within our First Bus, First Rail and North American divisions.	 First Rail data includes water used in Great Western Railway depots and station run by TransPennine Express, excludes any water used at Great Western Railway stations and all First Rail offices 		
		 A large number of sites in our North American operations manage vehicle washing through third party contractors, and consumption data is not collected 		
	 North America Rail Operations (currently a single service at Denton, TX), First Transit services in Panama and India, Tram Operations Limited. 			

Re-baselining Policy

To ensure meaningful comparison of emissions data over time and in relation to new business, franchises or developments, FirstGroup will consider re-baselining its carbon footprint if the following condition(s) is/are met;

- A single new development / divestment / franchise / reorganisation, work win or loss (or similar business change) giving rise to a 5% or more change in carbon footprint
- Multiple business changes which alone may impact carbon footprint below the 5% threshold, yet in combination exceed this.
- In the view of the CR Director, other significant re-organisation of the business, its assets and capital which would, on re-baselining enhance transparency / comparability of the Group's carbon performance.

A suitable re-baselining methodology will be selected in consideration of best practice corporate environmental reporting approaches.

2017/18 rebaselining: In 2017/18, We have adopted the principles described in Appendix E to the GHG Protocol Corporate Accounting and Reporting Standard Revised Edition (2005). We have agreed that a re-baselining is necessary in relation to a significant increase in our scope 2 emissions. These follow from the award of the SWR rail franchise on 20th August 2018 to FirstGroup and electrification of the GWR route from London to the West of England. In accordance with Appendix E of the GHG Protocol, we have adopted the following approach to re-baselining:

- We have calculated 'annual equivalent' revenue, Scope 1, Scope 2, Scope 3 and out of scope figures based on actual data we have collected in relation to our operation of the franchise from 20th August 2017
- We have applied these equivalents to the revenue, scope 1, scope 2, Scope 3 and out of scope totals reported in our 2016-17 annual report and accounts to enable direct comparison between these two periods
- We have reported carbon intensity per Million pounds of revenue using this new baseline.















Keeping people moving

D	((DI)	D - C 'C'	Boom today and a control of the
Peri	formance indicator (PI)	Definition	Boundaries, scope and exclusions
14	First Bus punctuality (% of services classed as 'on time')	The proportion of First Bus services that are classed as 'on time'.	First Bus punctuality is the percentage of buses operating 'on time' (no more than one minute early or five minutes late at their starting point). This KPI is based on a mixture of data from the following sources (and varies by route/operating company): • Automatic Vehicle Location (AVL) • Start Time Adherence (STA) - where the driver presses a button on the vehicle's ticket machine when leaving the starting point • Manual sampling recorded through observations. Frequency: Measured in First Bus periods (12 per financial year) per operating company, but reported as annual average for the whole First Bus division.
15	First Rail punctuality (Public Performance Measure score expressed as a moving annual average)	The proportion of First Rail services that are classed as punctual.	The rail industry's Public Performance Measure (PPM) reflects punctuality and reliability. Trains are deemed punctual if they arrive at their destination, having made all timetabled stops, within five minutes of scheduled time for London and South East and regional services (i.e. commuter services), and ten minutes for long distance trains. Non-franchised operators (including Hull Trains) are recorded as on time if they arrive at their final destination within ten minutes of the planned timetable. PPM is therefore the percentage of trains 'on time' compared to the total number of trains planned. Frequency: The annual average is calculated over the 365 days to 31 March by franchise. Data source: All performance data is supplied by Network Rail.













16	Greyhound punctuality (% of services classed as 'on time')	The proportion of Greyhound services that are classed as 'on time'.	The proportion of 'regularly scheduled' Greyhound services that are classed as 'on time'. From 2015/16, to be classed as 'on time', each Greyhound or Greyhound Express bus must be within 10 minutes of its scheduled departure time when leaving its originating point (for all prior year data before this threshold was 15 minutes). Data does not include BoltBus or Valley Transit services. Frequency: Collected in 12 periods, but shown in the Report as an annual average figure for the financial year by brand.
17	First Transit punctuality (% of services classed as 'on time')	The proportion of First Transit services that are classed as 'on time'.	The definition of an 'on time' service in First Transit varies depending on the individual contract. Data covers our mixture of fixed route, paratransit and shuttle services. Data source: a mixture of manual readings and automated vehicle tracking data. Frequency: Collected in 12 periods, but shown in the Report as an annual average figure for the financial year.
18	First Bus passenger satisfaction (% very or fairly satisfied)	The proportion of surveyed First Bus passengers that are satisfied with various aspects of our service, and in particular with their overall journey.	Source: Transport Focus Bus Passenger Survey. The independent passenger watchdog, Transport Focus, consults passengers to produce the annual Bus Passenger Survey which compares and benchmarks passengers' evaluations of the bus services they use. The survey covers services in England (outside London), and Scotland. The most recent survey was carried out in March 2017. Data is reported for: • Overall satisfaction with the journey • Satisfaction with punctuality • Satisfaction with value for money. Exclusions: 2013/14 data does not include the results from the survey of First Glasgow to maintain year on year comparability.













19	First Rail passenger satisfaction (% satisfied or good with their journey overall)	The proportion of surveyed First Rail passengers that are satisfied with their overall journey.	Source: Transport Focus National Rail Passenger Survey. The independent passenger watchdog, Transport Focus, collects passenger opinions of train services twice each year from a representative sample of passenger journeys and provides a network-wide picture of customers' satisfaction with rail travel. The latest surveys were published in January 2018
20	Greyhound passenger satisfaction (Net Promoter Score and customer satisfaction score)	The proportion of surveyed Greyhound passengers who would recommend our services to others.	Source: Greyhound customer satisfaction/Net Promoter Score email surveys. We send out a set of emails to customers the day after their travel. We parse the list down by eliminating those who have received the customer satisfaction survey within the last 6 months and those who have received a large number of general emails. WE then take a random sample of 50% of the remaining list and send the email. Scores are reported each day and each survey is reviewed by operations. Analysis is done on an ongoing basis and reported. Standard NPS scoring is done. We also measure customer satisfaction on a 5 point scale in terms of how satisfied were you with our service.
21	First Student customer satisfaction (average rating out of ten)	The average rating out of ten given by surveyed First Student customers for their overall satisfaction with our services.	Source: First Student customer surveys. Once a year we survey all contract school bus customers with over three buses.













22	First Transit customer satisfaction (average rating out of ten)	The average rating out of ten given by surveyed First Transit customers for their overall satisfaction with our services.	Source: First Transit customer surveys, including First Vehicle Services (FVS) customer feedback FVS, which provides fleet maintenance and ancillary support services for public sector customers.
----	---	---	--















Helping our communities to prosper

Perf	formance indicator (PI)	Definition	Boundaries, scope and exclusions
23	Total FirstGroup community investment (£) measured using the LBG criteria	The total annual value of our community and charitable donations, gifts in kind, donated time, and third party leveraged funds, covering Group and all divisions across the UK and North America.	Scope: The total value of our community investment (£) within the reporting year, using best efforts to capture data from across the Group. This is made up of a combination of cash, time and gifts in kind (PI 24), and leverage (PI 25). Donations from our North America businesses have been converted into GBP using our average conversion rate for the year, as advised by our financial reporting team and as used throughout the annual report. Methodology: The LBG model













Total FirstGroup community The total annual See comments for PI 23 above. investment (£) excluding leverage, value of our by division community and Scope: charitable donations, The total value of our community investment (£) within the reporting year (excluding leverage). These gifts in kind, donated cover: time, broken down by Cash: contributions made directly by the Company (such as donations and matched division. funding) Time: which includes employee volunteering, school visits and volunteered driver time for community events. The value of time contributions is calculated on the basis of an average cost per hour Gifts in kind: which includes donated travel tickets, advertising space and vehicle hire. The value of these gifts is calculated at cost to the business. Exclusions: Cash: excludes any donations made by employees, customers or external partners and suppliers (which is included within leverage) Time: excludes any employee time volunteered outside of normal working hours Leverage (such as employee payroll giving and donations from third parties such as customers and suppliers) is excluded from this PI as it is shown separately in PI 25. Methodology: The LBG model













25	Total community investment leverage (£), by source	The total annual value of our community and charitable leveraged funds raised, broken down by source.	Scope: Leverage, such as contributions from employees, customers and suppliers. This covers: Payroll giving Employee fundraising Other: including external sources such as customers and suppliers made in partnership with FirstGroup such as collection tins at train stations. Exclusions: All community investment other than leverage. Methodology: The LBG model
26	Total value of our Prostate Cancer UK partnership (£) against £1m target	The value of our Charity of Choice partnership with Prostate Cancer UK since it was launched on 1 April 2015 against a £1m target for 31 March 2018.	Scope: The value of our Charity of Choice partnership with Prostate Cancer UK since it was launched on 1 April 2015, covering: Corporate donations Gifts in-kind (at commercial value): such as advertising space on our buses Employee and customer fundraising.















Dedicated to safety

Peri	formance indicator (PI)	Definition	Boundaries, scope and exclusions
27	Employee injury rate (per 1,000 employees)	The number of employee injuries reported, expressed in terms of per thousand employees per year.	Scope: An employee is a person who has a current contract of employment (verbal or written) and is 'on duty' at the time of the incident (excludes contractors). An injury is an incident which results in visual or physical evidence of damage to a person, their body or where a witness/person states that someone has been injured as a result. Calculation: Number of incidents in the last 12 periods / (average number of employees in the last 12 periods / 1,000) / number of weeks in the last 12 periods * number of weeks in the year. Exclusions: Injuries as a result of assault, shock and trauma Employee Injuries are recorded in line with Group wide safety definitions and any exclusions mentioned therein.
28	Lost Time Injury rate (per 1,000 employees)	The number of employee injuries which resulted in time lost from work of one day or more, expressed in terms of per thousand employees per year.	Scope: The number of employee injuries (see definition in PI 27) which have resulted in one or more days lost from work. Calculation: Number of incidents in the last 12 periods / (average number of employees in the last 12 periods / 1,000) / number of weeks in the last 12 periods * number of weeks in the year. Exclusions: Injuries as a result of assault, shock and trauma Lost Time Injuries are recorded in line with Group wide safety definitions and any exclusions mentioned therein.













29	Passenger injury rate (per million miles)	The number of passengers injured, expressed in terms of per million miles travelled by our fleets.	Scope: A passenger is a person who is not a member of staff on duty but who has or is intending to travel on a service regardless of whether a valid ticket is held or not. An injury is an incident which results in visual or physical evidence of damage to a person, their body or where a witness/person states that someone has been injured as a result. Calculation: Number of incidents in the last 12 periods / (number of miles travelled by our fleets in the last 12 periods / 1,000,000). Exclusions: Passenger Injuries are recorded in line with Group wide safety definitions and any exclusions mentioned therein
30	Signals Passed at Danger (SPAD) rate (per million rail miles)	The number of Category A SPADs in the reporting year within First Rail expressed in terms of per million rail miles.	Scope: Any signal passed at danger without authority when a stop aspect or indicator (and any associated preceding indicators) was displayed correctly. This is standard for all FirstGroup train operating companies. Calculation: Number of incidents in the last 12 periods / (number of rail miles travelled in the last 12 periods / 1,000,000). Exclusions: • SPADs are recorded in line with Group wide safety definitions and any exclusions mentioned therein













31	Vehicle collision rate (per million miles)	The number of vehicle collisions, expressed in terms of per million miles.	Scope: Any FirstGroup vehicle contact with another vehicle, a bicycle, a motorcycle, a stationary object, a pedestrian or large animal. Calculation: Number of incidents in the last 12 periods / (number of miles travelled in the last 12 periods / 1,000,000) Exclusions: • First Rail • Vehicle Collisions are recorded in line with Group wide safety definitions and any exclusions mentioned therein.
32	Incidents of sleeping children in Student	The number of incidents of children left unattended on a First Student bus.	Scope: Any time a child/passenger is unintentionally left unattended on a vehicle providing school transportation for any period of time. The trigger for classifying the event is the driver or attendant stepping completely off the bus leaving no FirstGroup employee or school district person on board. Exclusions: Sleeping children are recorded in line with Group wide safety definitions and any exclusions mentioned therein.















Valuing our people

Performance indicator (PI) Defini		Definition	Boundaries, scope and exclusions
33	Employee Gender - Total for FirstGroup	The number of persons of each sex who were active employees of FirstGroup plc at 31 March of each reporting year.	Scope: Active employees at 31st March of each reporting year, defined as someone who works on a regular basis for the company and is processed through the company payroll system. Exclusions: Contractors who are not paid through the company payroll system Inactive employees, such as those who have retired Employees in our India, Puerto Rico, Panama and Mexico businesses due to lack of available data
34	Employee Gender - Total for FirstGroup by geography	The number of persons of each sex who were active employees of FirstGroup plc at 31 March of each reporting year, broken down by geography.	Scope: Active employees at 31 March of each reporting year, defined as someone who works on a regular basis for the company and is processed through the company payroll system, broken down by geography: • UK / Ireland • USA • Canada Exclusions: • Contractors who are not paid through the company payroll system • Inactive employees, such as those who have retired • Employees in our India, Puerto Rico, Panama and Mexico businesses due to lack of available data













35	Employee Gender - Total for FirstGroup by division	The number of persons of each sex who were active employees of FirstGroup plc at 31 March of each reporting year, broken down by division or operating company.	Scope: Active employees at 31 March of each reporting year, defined as someone who works on a regular basis for the company and is processed through the company payroll system, broken down by division or operating company:
36	Employee Gender - FirstGroup plc Board	The number of persons of each sex who were Directors of FirstGroup plc at 31 March of each reporting year.	Scope: FirstGroup plc Directors at 31 March of each reporting year.
37	Employee Gender – Senior Managers	The number of persons of each sex who were Senior Managers of FirstGroup plc at 31 March of each reporting year.	Scope: Senior Managers at 31 March of each reporting year. Senior Managers are defined in the Companies Act 2006 as "any employee who has responsibility for planning, directing or controlling the activities of the company, or a strategically significant part of the company". Exclusions: Employees in our India, Puerto Rico, Panama and Mexico businesses due to lack of available data













38	Employee Gender – Executive Committee	The number of persons of each sex who were members of the Executive Committee of FirstGroup plc at 31 March of each reporting year.	Scope: Executive Committee members at 31 March of each reporting year.
39	Employee Gender - Apprenticeship programme	The number of persons of each sex participating in the FirstGroup Apprenticeship programme in each reporting year.	Scope: Persons commencing a FirstGroup Apprenticeship programme* in the UK within each reporting year. *Engineering, customer service, operations, and management programmes.
40	Employee Gender - Graduate programme	The number of persons of each sex participating in the FirstGroup Graduate programme in each reporting year.	Scope: Persons commencing a FirstGroup Graduate programme* in the UK within each reporting year. *Engineering, operations, and commercial programmes.